

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Commonwealth Edison Company	:	
	:	00-0259
Petition for expedited approval of implementation	:	
of a market-based alternative tariff, to become	:	
effective on or before May 1, 2000, pursuant to	:	
pursuant to Article IX and Section 16-112 of	:	
the Public Utilities Act.	:	

ILLINOIS
COMMERCE COMMISSION
APR 20 9 52 AM '00
CHIEF CLERK'S OFFICE

STATEMENT OF POSITION

NOW COMES Central Illinois Light Company ("CILCO") by its attorneys, DEFREES & FISKE, pursuant the Hearing Examiner's Scheduling Ruling, dated April 13, 2000, and for its statement of position in response to the petition filed by Commonwealth Edison Company ("ComEd") in this matter, states as follows:

1. CILCO does not support the ComEd accelerated time frame to have the Commission enter an order on April 27. The schedule does not allow adequate time for the parties to properly address issues relating to the filing.

2. CILCO recommends that if the index proposed by ComEd is approved, a one-year sunset provision be incorporated in the Commission order. This provision would enable further analysis, examination and understanding of the Market Index and its applicability as a long-term solution to the Neutral Fact Finder process. For example, if a determination is made that Retail Electric Suppliers are required to supply reserve requirements, then modifications to the proposed index need to occur.

3. CILCO also recommends that ComEd grant flexibility to customers making energy purchase decisions during the time frame of this proceeding. Customers who elect the

Power Purchase Option in April should be granted a one-time opportunity to return to delivery services with retail electric suppliers within a 30-day time frame of the final order being entered.

4. All parties acknowledge the importance of establishing a fair market value of energy. This value can either promote or hamper the development of a competitive market in Illinois. As proposed, the market value for Period B will create exceptionally high customer transition charges (CTCs) which will strongly discourage any customer from leaving ComEd supply from September 2000 to May 2001. Consequently, there will be very little if any customer switching during this period. The proposal provides a summer fix for existing delivery service customers at the expense of customers who will be eligible to switch beginning this fall.

CENTRAL ILLINOIS LIGHT COMPANY


By Stan E. Ogden

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STATE OF ILLINOIS)
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COUNTY OF C O O K)

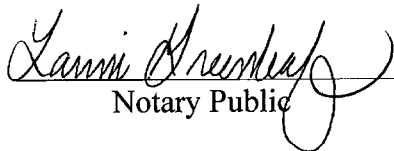
VERIFICATION

Stan E. Ogden, being first duly sworn, upon oath, deposes and says that he is Business Manager Energy Sales for Central Illinois Light Company; that he has read the above and foregoing Statement of Position filed on behalf of said petitioner, that he knows the contents thereof, and the same are true to the best of his knowledge and belief.



Stan E. Ogden

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 18th DAY
OF APRIL, 2000.



Notary Public

